South Worcestershire Councils

Community Infrastructure Levy Draft Charging Schedule

Submission Document

V2.0 – 26.04.26

Contents

1. Background

1.1 This is the Community Infrastructure Levy (CIL) Draft Charging Schedule submitted to the Secretary of State for independent examination under Regulation 16 of the Community Infrastructure Levy Regulations 2010 (as amended). It sets out the Council's proposed CIL charging framework, informed by the published evidence base and the representations received during consultation. The Draft Charging Schedule has been prepared to ensure that the proposed levy is appropriate, justified and viable, enabling the delivery of strategic and local infrastructure required to support planned development across the district.

1.2 A six week consultation on the Draft Charging Schedule commenced on Monday 2 February 2026 and ended on Monday 16 March 2026. The consultees were notified by email, social media posts, and webpage news announcements. Paper copies of the draft CIL Charging Schedule, the evidence base documents, the Consultation Statement of Representations Procedure, a 'plain language' Consultation Information Sheet and consultation response forms were available from libraries in Malvern, Tenbury Wells, Upton upon Severn, Worcester (The Hive), St Johns, Warndon, Pershore, Evesham, Droitwich Spa, and Broadway, as well as The Guildhall in Worcester and the Civic Centre in Pershore.

1.3 In 2010 the Government introduced the Community Infrastructure Levy (CIL) as the preferred mechanism for securing development contributions towards infrastructure to support growth in an area.

1.4 The Community Infrastructure Levy (CIL) is a charge on specified types of development to contribute to the infrastructure needed to support the delivery of the development plan. The charge provides a greater level of certainty to developers and landowners regarding their contributions and is charged per net square metre of new development. Further information on the types of development liable for the levy are detailed in the sections below.

1.5 The South Worcestershire Councils (SWCs), comprising of Malvern Hills District, Worcester City and Wychavon District Councils adopted individual Charging Schedules in 2017. The decision to introduce CIL was taken by the SWCs to contribute towards the funding required to deliver the joint South Worcestershire Development Plan (SWDP) adopted in 2016.

1.6 Amendments to the Community Infrastructure Levy Regulations (2010) were introduced in September 2019, with the main significant changes including the removal of pooling restrictions for Section 106 (S106) obligations; removal of the requirement for a Regulation 123 list; and the introduction of the requirement to annually produce an Infrastructure Funding Statement which must include a list of infrastructure projects that CIL might be spent on.

1.7 This CIL Charging Schedule has been updated to reflect new viability evidence supporting the SWDP Review.

1.8 Although charging schedules are not formally part of the relevant development plan, charging schedules and relevant plans should inform and be generally consistent with each other. Therefore, the NPPG states that *‘where practical, there are benefits to undertaking infrastructure planning for the purpose of plan making and setting the levy at the same time’* (Paragraph: 012 Reference ID: 25-012-20190901).

2 Introduction

2.1 In 2010, the Government introduced the Community Infrastructure Levy (CIL) as the preferred mechanism for securing developer contributions towards infrastructure to support growth in an area.

2.2 Each of the three councils in the SWCs are classed as charging authorities and therefore may charge CIL in respect of their own district. The adopted CIL rates have been in place since June (Wychavon and Malvern Hills) and September (Worcester) 2017 and there has been no demonstrable adverse impact on the supply of development land or the viability of development coming forward across the SWCs.

2.3 Despite this, there have been changes to legislation and to the wider economic environment since the Charging Schedule was adopted, and it is important that the CIL charges are reviewed to ensure that the SWCs are maximising funding towards infrastructure.

2.4 The SWCs adopted the South Worcestershire Development Plan Review (2021-2041) on the 26th March 2026. It is therefore considered that reviewing the Charging Schedule would demonstrate how the Charging Schedule will support the delivery of the SWDPR.

2.5 New viability evidence has been produced to support a review of the Charging Schedule and to provide evidence for the SWDPR. This will support the proposed rates following the CIL consultation.

2.6 The preparation of the Draft Charging Schedule is supported by the following evidence documents which can be found on each Councils website.

- The South Worcestershire CIL Viability Report (December 2025) examines the viability of various forms of development and consider whether differential CIL rates could be set that strike an appropriate balance between funding infrastructure and maintaining deliverability of development, in accordance with the CIL Regulations and national policy guidance. It also provides recommendations on the viability and deliverability of appropriate CIL charging rates across different development typologies within the area.
- The Infrastructure Delivery Plan Update (IDP) (December 2024) (EXAM40) that sets out the infrastructure requirements to support the delivery of planned development set out in the SWDPR. The IDP is a living document and therefore will be updated as required throughout the plan period.
- Worcestershire Parkway – Infrastructure Delivery Plan Addendum (December 2024) (EXAM39). This sets out the specific infrastructure requirements and triggers for the Worcestershire Parkway strategic allocation. As with the IDP, the Worcestershire Parkway Addendum is a living document and will also be updated as the strategic allocation is delivered.

- Strategic Sites Viability Assessment and Financial Viability Assessment (December 2024) (EXAM41) and Appendices (December 2024) (EXAM41A). This was undertaken by Aspinall Verdi and is a critical piece of evidence to assist in determining the most appropriate level for the CIL tariff. It considers the viability of development (including the strategic allocations) against the costs placed on new development through the application of the SWDPR's policies and the application of CIL to ensure that the cumulative impact of the Local Plan policies is viable and provides evidence of whether CIL should be charged for residential housing and to what extent.

2.7 All of the submission documents can be found on each Council's CIL webpage:

Malvern Hills District Council - Community Infrastructure Levy - Malvern Hills District Council
Worcester City Council - Community Infrastructure Levy - Worcester City Council
Wychavon District Council - Community Infrastructure Levy - Wychavon District Council

3 The Community Infrastructure Levy

3.1 Each individual local authority comprising the joint South Worcestershire Councils (Malvern Hills District Council, Worcester City Council, and Wychavon District Council) are each the charging authority for their areas for the purpose of Part 11 of the Planning Act and CIL Regulations 2010 (as amended).

3.2 The Community Infrastructure Levy is a tariff in the form of a standard charge on new development, which in south Worcestershire is set by the SWCs to help the funding of infrastructure. It is intended to supplement, or top up, other sources of funding to widen infrastructure delivery.

3.3 Most development has some impact on infrastructure and should contribute to the cost of providing or improving infrastructure. The principle behind CIL is for those who benefit financially from a planning permission to pay towards the cost of funding the infrastructure needed to support development.

3.4 CIL will improve the SWCs ability to mitigate the cumulative impacts on infrastructure from most developments as it is charged on a per square metre basis and is proportional to the scale of the development.

3.5 In investing in the infrastructure of the area, CIL is expected to have a positive economic effect on development in the medium to long term.

3.6 The SWCs must set CIL rates in a Charging Schedule and can implement these, after taking a consultation and an Examination in Public followed by adoption.

3.7 Regulation 14 of the CIL regulations (as amended) state that when setting CIL rates, the SWCs must strike an appropriate balance between the desirability to fund infrastructure through CIL and the potential effect (taken as a whole) of the levy on the economic viability of development in the area where CIL charges apply. When considering infrastructure costs, the SWCs need to estimate the cost of infrastructure to support development and take into account other sources of funding.

> **CIL Regulations 2010 (as amended), Part 3, Regulation 14**: ‘*14.—(1) In setting rates (including differential rates) in a charging schedule, a charging authority must strike an appropriate balance between— (a) the desirability of funding from CIL (in whole or in part) the actual and expected estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding; and (b) the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area. (2) In setting rates in a charging schedule, a charging authority may also have regard to actual and expected administrative expenses in connection with CIL to the extent that those expenses can be funded from CIL in accordance with regulation 61…*’

3.8 Regulation 13 of the CIL Regulations 2010 (as amended) makes provision for the setting of differential rates for different geographical areas, different development types/uses, and development size or a combination of them. Any differential rate should be justified by economic viability evidence.

3.9 The term 'taken as a whole' indicates that economic viability evidence is used to show that CIL rates can be borne by most development across South Worcestershire. It does not mean that CIL rates can be borne by each and every development. The SWCs have used evidence in the South Worcestershire CIL Viability Report and the SWDPR Local Plan Viability Assessment to inform appropriate CIL rates.

3.10 Infrastructure and economic viability evidence supporting the Draft Charging Schedule illustrates that an appropriate balance between funding infrastructure and economic viability has been sought.

4 CIL and S106 and S278 agreements

4.1 Section 106 (S106) agreements and Section 278 (S278) Highways Agreements will continue to be used to secure mitigation, affordable housing, open space provision and education and health facilities following the CIL review. The amended CIL regulations no longer contain a pooling restriction to a maximum of five S106 obligations to fund a specific piece of infrastructure. Both CIL and S106 funding can be secured against the same development, however, there will be no instance where both CIL and S106 will contribute towards the same piece of infrastructure. All projects proposed to be wholly or partially financed via CIL will be assessed via an established method and set of criteria.

4.2 Site specific planning obligations under S106 must satisfy three legal tests (in accordance with Regulation 122); they must be:

1. Necessary to make the development acceptable in planning terms;
2. Directly related to the development; and
3. Fairly and reasonably related in scale and kind to the development.

4.3 To ensure that developers are not being asked to fund the same infrastructure through both CIL and S106 agreements, certain types of infrastructure will only be sought either on site or through financial contributions via S106. A list of general types of infrastructure which is expected to be sought via S106 rather than CIL is shown below, and were viability tested on S106 assumptions:

- Affordable Housing;
- Education;
- Green Infrastructure including Areas of Informal Recreation;
- Malvern Hills SSSI Mitigation Strategy;
- National Landscape Impact;
- Health (Primary and Secondary);
- Waste;
- New Community Facilities;
- Transport;
- Police;
- Flood and Water management; and
- Site specific mitigation.

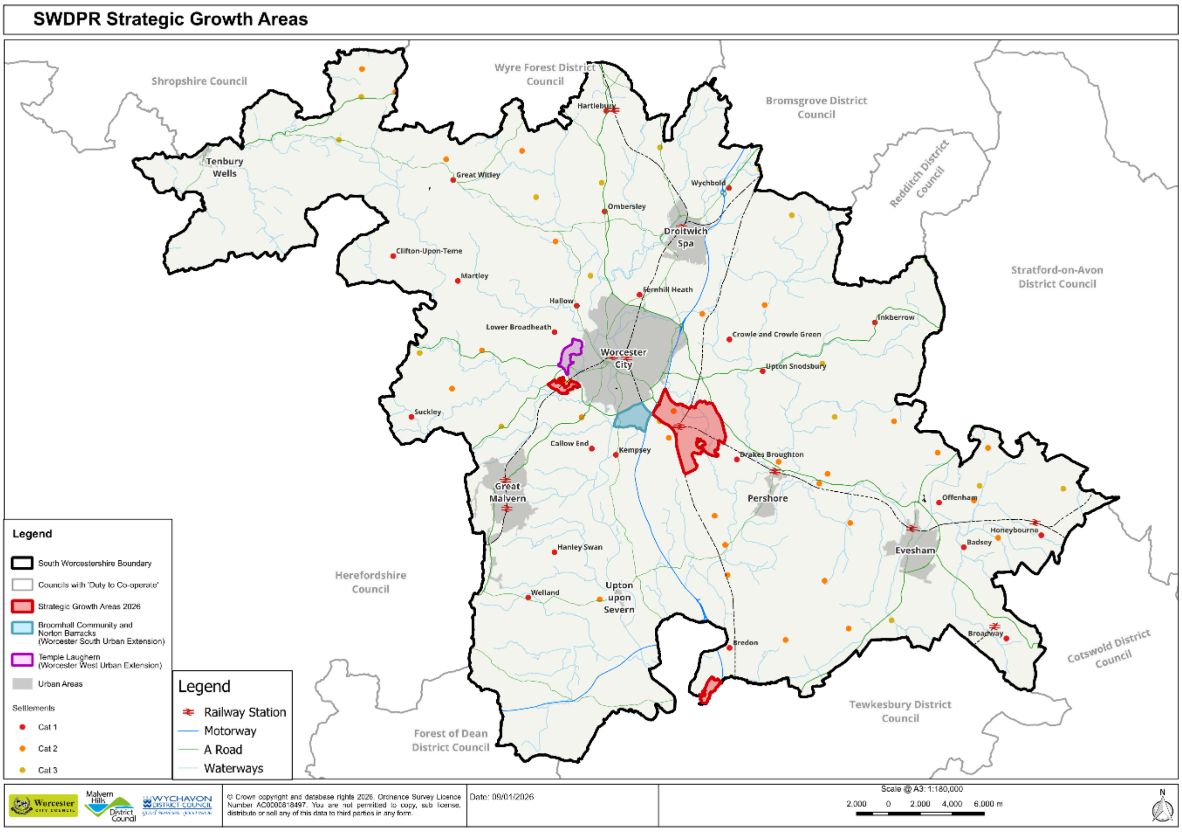
5 Viability and rate setting

5.1 In order to establish levy rates across the SWCs, the councils commissioned Aspinall Verdi to carry out a review of viability across the districts, examining the cumulative impacts of the policies in the SWDP Review and CIL. This review and further work on Strategic Site viability and retail and commercial viability was undertaken to assess the effect that any revised CIL rates would have on development viability. The outputs from these assessments are detailed in the relevant documents set out in section 2.5 above.

5.2 Full policy compliance is the default position when considering development viability and setting appropriate benchmark land values as set out in the NPPG (Viability) Paragraph: 012 Reference ID: 10-012-20180724. This includes the funding of infrastructure through CIL and Section 106 obligations, affordable housing and on-site policy requirements.

6 CIL Charging Maps

6.1 The SWDPR Review contains three new strategic growth areas which will be charged £0 per m^2 (Policy SWDPR 55: Worcestershire Parkway (now known as Wychavon Town); Policy SWDPR 56: Rushwick Expanded Settlement; Policy SWDPR 57: Mitton). It also carries forward two strategic growth areas from the South Worcestershire Development Plan (Policy SWDPR 68A: Broomhall (Worcester South Urban Extension) and Policy SWDPR 68B: Temple Laugherne (Worcester West Urban Extension)) which will also be charged £0 per m^2. These are shown in Map 1 below. Future allocated sites of 1000 or more dwellings will also be charged £0 per m^2. Strategic sites in the SWDP Review should be providing required infrastructure on site and further costs would make these developments unviable.



Map 1: Map of the strategic growth areas in the SWDP Review

7 CIL Rates

7.1 The CIL regulations allow for the setting of differential rates (including zero rates) for different geographical areas or for different land uses across our charging areas. The CIL regulations also provide for the ability to set differential rates in relation to scales of development.

7.2 To consider setting CIL rates for different types of development, the Strategic Sites and Financial Viability Assessment (December 2024) considered the cumulative application of policies in the SWDPR on different development typologies and the South Worcestershire CIL Viability Report (December 2025) considers the ability of each development type to support additional CIL rates. The summary of these findings is set out below.

Residential Development

7.3 The viability work tested sites which were on greenfield and brownfield land, as well as sites in Designated Rural Areas (RDAs). This was to ensure there was sufficient evidence that the proposed CIL charges were robust for all residential developments across south Worcestershire.

7.4 The CIL charges for residential development are shown below in Table 1 and are based on the recommendations from the South Worcestershire CIL Viability Report (December 2025). Residential development will be charged based on whether the development is on greenfield or brownfield land (detailed in Section 7 below).

Table 1: Proposed CIL Charging Rates		
Type of development	Current charge per sqm	Proposed new charge per sqm
Housing Greenfield RDA (all schemes)	£54.80	£120.00
Housing Greenfield (9 or less units)	£54.80	£120.00
Housing Greenfield (10-49 units)	£54.80	£54.80
Housing Greenfield (50 or more units) (including RDAs)	£54.80	£120.00
Housing Brownfield (9 or less units) (excluding RDAs)	£0.00	£120.00
Housing Brownfield RDAs	£54.80	£54.80
Housing Brownfield (10 to 49 units) (excluding RDAs)	£0.00	£0.00
Housing Brownfield (50 or more units) (excluding RDAs)	£0.00	£0.00
Purpose Built Student Accommodation (PBSA) Greenfield	£137.00	£137.00
Purpose Built Student Accommodation (PBSA) Brownfield	£137.00	£137.00
Build to Rent Accommodation Greenfield	-	£0.00
Build to Rent Accommodation Brownfield	-	£0.00
Age restricted / sheltered housing Greenfield	£0.00	£0.00
Age restricted / sheltered housing Brownfield	£0.00	£0.00
Extra care / assisted living Greenfield	£0.00	£0.00
Extra care / assisted living Brownfield	£0.00	£0.00
Strategic sites (and allocated sites over 1,000 units)	£0.00	£0.00

Residential Schemes

7.5 The RDA schemes on greenfield sites are viable at the current CIL rate and designated affordable housing levels. It is recommended to increase the CIL rate for greenfield sites to £120. For RDAs on brownfield sites, the current maximum CIL thresholds indicate that no increase is appropriate, so the rate remains at £54.70.

7.6 Viability testing demonstrates that residential schemes of fewer than 10 dwellings, including Rural Development Area typologies, can support CIL charges on both greenfield and brownfield land, with Section 106 costs and, where applicable, affordable housing contributions fully factored into the appraisals. However, in accordance with paragraph 024 of the CIL Planning Practice Guidance and the Written Ministerial Statement of 19 February 2024, the SWC has not used the absence of affordable housing requirements on non-major development as a justification for higher CIL rates. The proposed rate therefore reflects a proportionate and policy-compliant balance between viability, infrastructure funding needs and the delivery of small-scale development. The current CIL rate is £0 for brownfield sites and £54.70 for greenfield sites. It is recommended to increase the CIL rate up to £120 on both greenfield and brownfield sites with development under 10 units.

7.7 Medium schemes (10-49 units) on both greenfield and brownfield sites show no additional capacity for CIL uplift. The recommended rates therefore remain at the current levels of £54.70 for greenfield sites and £0 for brownfield sites. This is due to the higher (Median) BCIS costs.

7.8 Large greenfield schemes display capacity for increased CIL contributions, supporting a recommended rate of £120. Large brownfield schemes remain constrained, with limited or no capacity for uplift, so the recommended CIL rate stays at £0.

Purpose Built Student Accommodation (PBSA) and Build to Rent (BtR) schemes

7.9 PBSA schemes have no capacity to support a CIL charge uplift. The recommended rate remains the same.

7.10 BtR was a new typology tested for this Review. BTR schemes also show no capacity for CIL contributions currently, the recommended rate is therefore £0.

Senior Housing Schemes (Sheltered and ExtraCare)

7.11 Senior Housing schemes (both Sheltered and ExtraCare) also show no capacity for CIL contributions, the recommended rate therefore remains the same at £0.

Strategic Sites

7.12 There is not sufficient headroom to charge CIL in the current economic market; it is important for delivery that the infrastructure is funded through the most appropriate mechanism. S106 agreements enable more flexibility (especially in two-tier authorities) for the delivery of infrastructure compared to CIL. This is particularly the case where there is uncertainty in respect of the strategic infrastructure costs due to the stage of design and phasing. It is therefore proposed that the CIL charging Schedule excludes all allocated sites over 1,000 units which will ensure the Charging Schedule is 'future-proofed'.

Retail and Commercial

7.13 The CIL charges for retail and commercial development are shown below in Table 2 and are based on the recommendations from the CIL Viability Reports.

Table 2: Proposed CIL rates for retail and commercial development

Type of development	Current charge per sqm	Proposed charge per sqm
Large format / discount format convenience retail	£60.00	£150.00
Small (express) convenience retail	£60.00	£150.00
Drive Thru	-	£150.00
Office use	£ 0.00	£ 0.00
Retail Warehouse	£ 0.00	£ 150.00
Industrial / logistics use (Greenfield)	£ 0.00	£ 120.00
Industrial / logistics use (Brownfield)	£ 0.00	£60.00
Strategic sites (and allocated sites over 1,000 units)	£0.00	£0.00

7.14 Express stores/ Large format / discount format convenience retail development is proposed to be charged up to £150 per square metre (per sqm).

7.15 Drive Thrus are a new typology tested for this review. Roadside retail is an increasingly common format, and recent proposals for drive thrus and associated uses in the area suggest rising demand especially near major junctions or SUE's. Testing shows that they can support a CIL rate of £150 per square metre.

7.16 Industrial and logistics uses are proposed to be charged at £120 per square metre for greenfield typologies and £60 per square metre for brownfield typologies.

8 Calculating the chargeable amount

8.1 The council will calculate the amount of CIL chargeable to qualifying development utilising the formula set out in the 2010 CIL Regulations (as amended). In summary the amount of CIL chargeable will be calculated as follows:

$$\frac{CIL\ Rate\ \times Chargeable\ Floor\ area\ (m^2) \times RICS\ CIL\ Index\ (Ip)}{RICS\ CIL\ Index\ (Ic)}$$

$$(Ip) = index\ figure\ for\ the\ calendar\ year\ in\ which\ planning\ permission\ was\ granted$$

$$(Ic) = index\ figure\ for\ the\ calendar\ year\ in\ which\ the\ charging\ schedule\ took\ effect$$

8.2 Further detail on calculating the amount due is contained in the 2010 CIL Regulations (as amended). The Community Infrastructure Levy Regulations 2010 (legislation.gov.uk)

9 CIL Implementation and Payments

CIL Liability

9.1 The Levy rate is expressed as a £ per m^2 charge (gross internal area) within south Worcestershire. The levy **will be** applied to:

- buildings into which people normally go;
- new build floor space of at least 100 square metres;
- the creation of a new dwelling (even if the floor space is less than 100 square metres); and
- the conversion or change of use of a building that is no longer in lawful use. Development still needs to include 100 square metres or more new floorspace or the creation of a new dwelling. If a building is still in lawful use, CIL is only payable on the additional new floorspace after factoring in the existing floorspace that can be offset against the new floorspace (even if the total is under 100 square metres).

9.2 The Levy may also apply to development permitted by a 'general consent' (including permitted development) commenced on or after 6 April 2013.

CIL exemptions

9.3 Development **will not be** liable for CIL if it:

- Creates less than 100 sqm of new build floor space measured as GIA and does not result in the creation of one or more dwellings;
- involves any change of use, conversion or subdivision of, or creation of mezzanine floors within a building which has been in lawful use for at least six months in the 3 years prior to the development being permitted and does not create any new build floorspace; or
- is for a building into which people do not normally go, or only go intermittently for the purpose of inspecting or maintaining fixed plant or machinery; or
- is for a structure which is not a building, such as pylons or wind turbines; or
- is for a use which benefits from a zero or nil charge (£0 psm) as set out in a CIL Charging Schedule.

9.4 Where buildings are demolished to make way for new buildings, the Levy charge will be based on the floorspace of new buildings less the floorspace of the demolished buildings (provided the buildings were in lawful use prior to demolition).

9.5 The CIL regulations state that affordable housing and charitable development (developed by a registered charity for charitable purposes), as well as self-build residential properties, are non-chargeable, provided exemption is sought from CIL. Additional exemption / relief claim forms may be required by the Charging Authority. Affordable housing will continue to be secured via S106 agreements.

10 Spending CIL and Reporting

10.1 The 2010 CIL Regulations (as amended) require all local planning authorities that issue a CIL liability notice or enter S106 planning obligations during a reporting year to publish an Infrastructure Funding Statement (IFS) at least annually. The IFS should, as a minimum, include the information set out in Schedule 2 of the 2010 CIL Regulations (as amended). This includes reporting on the amount of CIL collected, allocated, unallocated and spent for the reported year, and the amount of CIL passed onto Parish Councils as well as the total amount of CIL collected, allocated and unallocated before the reported year. As part of the IFS a list of items of infrastructure is required to identify the quantum of CIL allocated or spent on each item.

10.2 Each of the three local planning authorities in south Worcestershire publish an IFS individually, as required by the regulations by the close of each year. CIL is collected by each council individually and each IFS details the amount collected for the respective council.

10.3 For further information, the IFS for each council is available on their websites.

Malvern Hills District Council - Community Infrastructure Levy - Malvern Hills District Council

Worcester City Council - Developer Contributions - Worcester City Council

Wychavon District Council - Community Infrastructure Levy - Wychavon District Council

11 Instalments Policy

11.1 The levy is non-negotiable and is payable to the relevant charging authority on commencement of development or, for large development, over an agreed phased period as set out in the instalments policy in Appendix A.

11.2 Under section 70 of the 2010 CIL Regulations (as amended) payment by instalment is provided for where an instalments policy is in place, provided this is published on the charging authorities' website. An instalment policy can assist the viability and delivery of development by taking account of financial restrictions, such as may be encountered in the development of homes within the buy-to-let sector. Few, if any, developments generate value until they are completed either in whole or in phases. The council may revise or withdraw the instalments policy if they consider this to be necessary.

12 Percentage to neighbourhoods / Neighbourhood Funds

12.1 Where CIL exists, 15% or 25% of levy receipts will be passed onto parish or town councils, in a neighbourhood proportion, which will then have control over how it is spent (a 25% share is dependent on a neighbourhood plan being in place). In un-parished areas (applicable to some areas of Worcester City), the 15% of levy receipts will be held by the charging authority, who should then engage with the communities where development has taken place and agree with them how best to spend the neighbourhood funding. For areas with no neighbourhood plan, the 15% share is capped at £100 per existing council tax dwelling per year. For areas with an adopted neighbourhood plan, the 25% share of levy receipts is uncapped. Figure 1 below provides a summary of the differing levy receipt permutations.

Figure 1: Relationship between the levy and neighborhood plans in England

Parish council	Neighbourhood plan	Levy
✔	✔	25% uncapped, paid to parish each year
✔	✗	15% capped at £100/dwelling (indexed for inflation), paid to parish each year
✗	✔	25% uncapped, local authority consults with community about how funds can be used, including to support priorities set out in neighbourhood plans
✗	✗	15% capped at £100/dwelling (indexed for inflation), local authority consults with community to agree how best to spend the neighbourhood funding

Source: National Planning Practice Guidance Paragraph: 145 Reference ID: 25-145-20190901

12.2 Whilst CIL receipts are generally required to be spent on infrastructure-specific items, the neighbourhood portion can be spent on a wider range of things than the rest of the levy, if it meets the requirement to ‘support the development of the area, or any part of that area’ (2010 CIL Regulations (as amended) section 59C).

13 Review

13.1 Over the coming years, values and costs of development could change significantly, and the market could become more certain or indeed more uncertain. It is difficult to predict how and when such changes may happen. It will therefore be important to monitor the market and review the Levy as appropriate.

14 Sustainability

14.1 The CIL charging schedule does not require a Sustainability Assessment as it is a financial document rather than a 'land use planning' document. The planned development, including infrastructure to be funded through CIL are evidenced and tested as part of the SWDP Review.

Appendix A

In accordance with Regulation 69B of the CIL Regulations 2010 (as amended) the charging authorities have produced a CIL Instalments Policy. This allows persons liable to pay CIL to do so by instalments provided they have complied with the relevant regulations. The time that the first instalment payment is due is calculated from the date the development is commenced. The existing Instalments Policy was introduced on 5 June 2017, and it is not proposed to amend this.

Total amount of CIL Liability	Number of instalments	Payment Periods and Proportion of CIL due			
Any amount less than £50,000	None	Total amount payable within 60 days of commencement of development			
		1st instalment	**2nd instalment**	**3rd instalment**	**4th instalment**
Amounts from £50,000 to £249,999	Two	50% payable within 60 days of commencement of development	50% payable within 6 months of commencement of development		
Amounts from £250,000 to £1,000,000	Three	30% payable within 60 days of commencement of development	30% payable within 6 months of commencement of development	40% payable within 9 months of commencement of development	
Any amount greater than £1,000,000 - In principle CIL can be paid in 4 instalments for any amount greater than £1,000,000. However instalments will be open to negotiation on an individual basis	Four	25% payable within 60 days of commencement of development	25% payable within 6 months of commencement of development	25% payable within 9 months of commencement of development	25% payable within 18 months of commencement of development